REMARKS

This Application has been carefully reviewed in light of the Final Office Action dated June 15, 2007 (*"Final Office Action"*). In the Office Action, Claims 1-16 are pending and stand rejected. Applicants have amended Claims 1 and 8 and added new Claims 17-20. Applicants submit that no new matter is added by these amendments. Applicants respectfully request reconsideration and favorable action in this case.

Section 101 Rejections

The *Final Office Action* rejects Claims 1-16 under 35 U.S.C. §101 because the claimed invention allegedly lacks patentable utility and/or is directed to non-statutory functionality. Specifically, the Examiner states that Claims 1-16 do not produce a useful result, are directed to an abstract idea, and are directed solely to non-functional descriptive material. (*Final Office Action*, page 2). Although Applicants continue to believe that all previously pending claims recite statutory subject matter under § 101, to advance this case expeditiously to issuance, Applicants have amended independent Claims 1 and 8.

Applicants submit that independent Claims 1 and 8 each produce a useful, concrete, and tangible result and, thus, are directed to statutory subject matter. Amended Claim 1 recites "receiving a user request for an entry" and "in response to receiving the user request, determining a domain name associated with the entry and a domain name associated with the user." According to Claim 1, the user is allowed "to access the entry if the domain name associated with the entry is the same as the domain associated with the user." Conversely, the user is not allowed "to access the entry if the domain name associated with the entry is not the same as the domain name associated with the user." Thus, Claim 1 produces a useful, concrete, and tangible result. One example of such a useful, concrete, and tangible result includes "allowing the user to access the entry if the domain name associated with the entry is the same as the domain associated with the user." Another example of such a useful, concrete, and tangible result includes "not allowing the user to access the entry if the domain name associated with the entry is not the same as the domain name associated with the user." For analogous reasons, independent Claim 8 also produces a useful, concrete, and tangible result and is directed to statutory subject matter.

Thus, Applicants respectfully submit that Claims 1 and 8 are directed to statutory subject matter. Because Claims 1 and 8 are directed to statutory subject matter, Applicants respectfully request the Board to direct the Examiner to withdraw the rejection of Claims 1-16 under 35 U.S.C. § 101.

Section 102 Rejections

The Office Action rejects Claims 1 and 8 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application Publication No. 2004/0213409 issued to Murto et al. ("*Murto*"). Applicants respectfully request reconsideration and allowance of Claims 1 and 8 for the reasons discussed below.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987); MPEP § 2131. In addition, "[t]he identical invention <u>must</u> be shown in as complete detail as is contained in the . . . claims" and "[t]he elements <u>must</u> be arranged as required by the claim." *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989); *In re Bond*, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990); MPEP § 2131 (*emphasis added*).

Independent Claim 1 of the present Application, as amended, recites:

> A method for use in a Web Services arrangement comprising:
> arranging User object(s) under a repository layer comprising one or more Repository objects collectively forming a Prefix, each User object representing a Web Services account;
> arranging Business Entity object(s) under User object(s);
> arranging corresponding TModel object(s) under at least one of User object(s), Repository object and Prefix;
> receiving a user request for an entry;
> in response to receiving the user request, determining a domain name associated with the entry and a domain name associated with the user;
> allowing the user to access the entry if the domain name associated with the entry is the same as the domain associated with the user; and
> not allowing the user to access the entry if the domain name associated with the entry is not the same as the domain name associated with the user.

Thus, independent Claim 1, as amended, recites that upon receiving a user request for an entry, determinations are made as to the domain name associated with the entry and the domain name associated with the user. If the domain names are the same, the user is allowed to access the entry. If the domain names are not the same, the user is not allowed to access the entry. Whether considered alone or in combination with any other cited references, *Murto* does not disclose, teach, or suggest this combination of claim elements.

According to *Murto*, "a method is disclosed to enable a mobile phone or wireless PDA to discover Internet businesses and services in a specified geographical location by accessing the Universal Description, Discovery and Integration (UDDI) registry." (*Murto*, Page 1, paragraph 12). Specifically, *Murto* discloses "construct[ing] a personal user profile of the user's UDDI searching strategies and Internet accessing preferences" that can be used as a shortcut for online or offline queries to the UDDI registry or for accessing pages from web sites, in response to the user's entry of abbreviated inputs to the wireless device." (*Murto*, Page 1, paragraph 12). Alternatively, *Murto* discloses "a method is embodied as programmed instructions that may be executed within a separate knowledge engine server to query the UDDI registry in response to commands from the user's wireless device." (*Murto*, Page 1, paragraph 12). Figures 2A-2B, 4, and 4A-4B illustrate flow sequences for the described methods. In no scenario is there any disclosure of "in response to receiving the user request, determining a domain name associated with the entry and a domain name associated with the user," as recited in Applicants' Claim 1. Similarly, there is no disclosure of "allowing the user to access the entry if the domain name associated with the entry is the same as the domain associated with the user" and "not allowing the user to access the entry if the domain name associated with the entry is not the same as the domain name associated with the user," as recited in Applicants' Claim 1. The recited claim elements are absent from *Murto*.

For at least these reasons, Applicants request reconsideration and allowance of Claim 1.

Similar to Claim 1, Claim 8 recites "in response to receiving the user request, code for

determining a domain name associated with the entry and a domain name associated with the user." Claim 8 also recites "code for allowing the user to access the entry if the domain name associated with the entry is the same as the domain associated with the user" and "code for not allowing the user to access the entry if the domain name associated with the entry is not the same as the domain name associated with the user." Therefore, for reasons analogous to those discussed above with regard to Claim 1, Applicants respectfully contend that Claim 8 is allowable over *Murto*. For at least these reasons, Applicants request reconsideration and allowance of Claim 8.

Section 103 Rejections

The Office Action rejects Claims 2-7 and 9-16 under 35 U.S.C. §103(a) as being unpatenable over *Murto* in view of U.S. Patent Application Publication No. 2004/0002955 A1 of Gadbois et al. (*"Gadbois"*). Applicants respectfully request reconsideration and allowance of Claims 2-7 and 9-16 for the reasons discussed below.

Dependent Claims 2-7 and 9-16 depend upon independent Claims 1 and 8, respectively, which Applicants have shown above to be allowable. Accordingly, dependent Claims 2-7 and 9-16 are not obvious over the proposed *Murto-Gadbois* combination at least because Claims 2-7 and 9-16 include the limitations of their respective independent claims. Since Claims 2-7 and 9-16 incorporate the limitations of their respective independent claims, Applicants have not provided detailed arguments with respect to Claims 2-7 and 9-16. However, Applicants remain ready to do so if it becomes appropriate. Applicants respectfully request reconsideration and allowance of Claims 2-7 and 9-16.

New Claims 17-20 are Allowable

New Claims 17-18 and 19-20 have been added and depend on Claims 1 and 8, respectively, which Applicants have shown above to be allowable. Claims 17-20 are patentable at least because of their respective dependencies.

Additionally, dependent Claims 17-20 recite features that are not disclosed in the prior art of record. For example, Claim 17 recites "providing a plurality of repository layers distributed on a plurality of servers, each repository layer comprising at least on repository

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object." As another example, Claim 17 recites "assigning a domain name to each of the plurality of repository layers." As still another example, Claim 17 recites "arranging User object(s) under each of the repository objects." As still another example, Claim 18 recites "providing a plurality of repository layers distributed on a plurality of servers, each repository layer comprising at least on repository object" and "logically representing each entry on each server, each entry only stored on a selected one of the plurality of servers." Claims 19 and 20 recite certain features and operations that are analogous to those of Claims 17 and 18. Applicants respectfully submit that the prior art of record does not disclose, teach, or suggest these features.

In the *Final Office Action*, the Examiner relies on *Murto* for disclosure of the repository layer. However, the repository of *Murto* is not analogous to Applicants' recited "plurality of repository layers distributed on a plurality of servers." In fact, *Murto* merely discloses a single "knowledge engine server 140" that stores a plurality of user profiles. (*Murto*, FIGURES 4 and 4A; Page 10, paragraph 169). Because *Murto* only depicts and describes a single server, *Murto* cannot be said to disclose, teach, or suggest "a plurality of repository layers distributed on a plurality of servers," as recited in Claims 17-20. Furthermore, since there is no disclosure in *Murto* of "a plurality of servers," there certainly is no disclosure of "assigning a domain name to each of the plurality of repository layers," as recited in Claims 17 and 19. In fact, there is no disclosure even of assigning a domain name to the single server 140. Finally, since there is no disclosure by *Murto* of a "plurality of repository layers distributed on a plurality of servers," there also can be no disclosure of "logically representing each entry on each server, each entry only stored on a selected one of the plurality of servers," as recited in Claims 18 and 20.

Because neither *Murto* nor *Gadbois* (or their proposed combination) discloses the elements recited in new Claims 17-20, Applicants respectfully request consideration and allowance of new Claims 17-20.
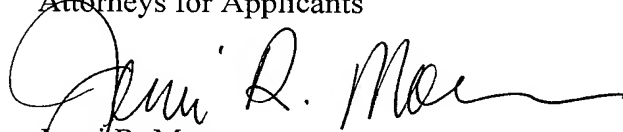
CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other apparent reasons, Applicants respectfully request full allowance of all pending Claims.

If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicants stands ready to conduct such a conference at the convenience of the Examiner.

Applicants believe no fee is due. However, should there be a fee discrepancy, the Commissioner is hereby authorized to charge any required fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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Date: July 24, 2007

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